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January 17, 2025

VIA ECF

Honorable Pamela K. Chen, United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. McMahon, et al.
Docket No. 21-cr-265

Dear Judge Chen,

As Your Honor is aware, this Firm represents Defendant Michael McMahon in the above-referenced matter. I write to respectfully request that the Court enter the attached Proposed Order, which will allow Mr. McMahon to travel to Virginia and Washington D.C. for four (4) days, from Saturday, January 18, 2025 to Tuesday, January 21, 2025, as Mr. McMahon has been invited to attend the Presidential Inauguration in Washington D.C. on Monday, January 20, 2025. We apologize for the urgency of this request, as Mr. McMahon was only invited to attend the Presidential Inauguration late Wednesday evening, and we wanted to allow Pretrial Services and the Government sufficient time to state their respective positions to Mr. McMahon's request, as they now have.

Specifically we have been in contact with Rhonda LeGrand of the United States Office of Pretrial Services, who has advised that her Office has no objection to Mr. McMahon's proposed travel, given that Mr. McMahon has, throughout the long pendency of this matter, always been in full compliance with the terms of his pretrial release; Pretrial Services requests only that it be provided with a travel itinerary, which we will certainly do – that requirement is reflected in the Proposed Order attached hereto. The Government has advised that it defers to Pretrial Services with respect to Mr. McMahon's proposed travel.

If the enclosed Order is satisfactory to Your Honor, we would be most grateful if the Court would execute and file it at Your Honor's earliest convenience, given the timing of the proposed travel. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact me. Thank you for your kind consideration of this matter.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All counsel of record (via ECF)